

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

NAPOLEÓN SEPÚLVEDA MORENO, §  
and LUZ MARIA MARTINEZ CASTRO, §  
and SANDRA LIZETTE CARDENAS §  
RAMIREZ, as Next Friend of §  
S.S.C., minor child, §  
Individually and for and on behalf of §  
All Those Who Are Entitled To Recover §  
Under The Texas Wrongful Death §  
and Survival Acts for the Death of §  
JESUS IVAN SEPÚLVEDA MARTINEZ, §  
and BRENDA BERENICE CASIAS §  
CARRILLO, §

*Plaintiffs,* §

v. §

NO. 3:24-CV-00059-DB

LASALLE CORRECTIONS V LLC, §

*Defendant.* §

**PLAINTIFFS' WITNESS LIST**

TO THE HONORABLE DAVID BRIONES, SENIOR UNITED STATES DISTRICT JUDGE:

COMES NOW Plaintiffs, NAPOLEON SEPÚLVEDA MORENO, LUZ MARIA MARTINEZ CASTRO, SANDRA LIZETTE CARDENAS RAMIREZ, as Next Friend of S.S.C., minor child, and BRENDA BERENICE CASIAS CARRILLO in the above-entitled and captioned cause and pursuant to Local Rule CV-16(f)(5), submit their Witness List as follows:

**Witnesses Expected to Testify**

1. **Napoleon Sepúlveda Moreno**, Plaintiff, c/o Christopher Benoit, attorney for Plaintiff
2. **Luz Maria Martinez** Plaintiff, c/o Christopher Benoit, attorney for Plaintiff
3. **Sandra Lizette Cardenas Ramirez**, as Next Friend of S.S.C., minor child, S.S.C., minor child, Individually and for and on behalf of All Those Who Are Entitled To Recover Under The Texas Wrongful Death and Survival Acts for the Death of Jesús Ivan Napoleón Martínez, Plaintiff, c/o Christopher Benoit, attorney for Plaintiff
4. **Brenda Berenice Casias Carrillo**, Plaintiff, c/o Christopher Benoit, attorney for Plaintiff

5. **Arvin West**, Hudspeth County Sheriff, PO Box 39, Sierra Blanca, TX 79851, Phone: (915) 369-2161, Email: sheriff@hudspethsheriff.org
6. **Andrew Virdell**, Former Hudspeth County Commissioner, 607 W. Broadway, Van Horn, Texas 79855, Phone: , Email: (432) 284-9141, highcountry1@windstream.net
7. **Michael Rose**, Hudspeth County Water Control & Improvement District #1, P.O. Box 188, Sierra Blanca, TX 79851, (915) 369-2221
8. **Robert (“Jay”) Eason**, c/o attorneys for LaSalle Corrections V, LLC
9. **Fausto A. Rodriguez, M.D.**, Pathologist, Autopsy Pathology Service, 12154 Coral Gate Dr., El Paso, TX 79936, Tel (915) 855-2454, and/or New Haven Trinity Mortuary Service Morgue, 109 Seneca Dr., El Paso, TX 79915

Dr. Rodriguez is employed by Autopsy Pathology Service. He conducted the autopsy of Jesús Ivan Sepúlveda Martínez. He will explain how he conducted his autopsy, what he found inside Mr. Sepúlveda Martínez’s body, and his expert opinion that Mr. Sepúlveda Martínez died of a shotgun wound to the head. He will testify as to Mr. Sepúlveda Martínez’s pain and suffering prior to his death.

10. **Stephen Flaherty, M.D.**, Del Sol Medical Center Campus of LPDS, 10301 Gateway West Blvd., El Paso, Texas 79925

Dr. Flaherty is a trauma surgeon with Del Sol Medical Center Campus. He was the attending surgeon overseeing care of Brenda Berenice Casias Carrillo during her hospitalization immediately after she was wounded on September 27, 2025. He will testify as to Ms. Casias’ treatment while under his care, his observations of her physical injuries, her pain and suffering, the disfigurement and physical impairment caused by the shotgun wound, and his medical opinion regarding prognosis of her injuries upon discharge.

#### **Witnesses Who May Testify**

11. **Brenda Sanchez**, Custodian of Records for Hudspeth County & District Clerk, PO Box 58, Sierra Blanca, TX 79851, Phone: (915) 369-2301, Email: bsanchez@co.hudspeth.tx.us
12. **Susan D. Maldonado**, Custodian of Records Del Sol Medical Center, 10301 Gateway Blvd W, El Paso, Texas 79925, Phone: (915) 263-5656
13. **Belinda Vasquez**, Custodian of Records University Medical Center, 4815 Alameda Ave., El Paso, Texas 79905
14. **Mary Lewis**, Hudspeth County Sheriff, PO Box 39, Sierra Blanca, TX 79851, Phone: (915) 369-2161

Plaintiffs reserve the right to call witnesses not identified herein, for the sole purpose of impeachment.

Respectfully submitted,

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/s/ Christopher Benoit

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*Attorneys for Plaintiffs*

#### **CERTIFICATE OF SERVICE**

The undersigned counsel certifies that on August 8, 2025, the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Christopher Benoit

Christopher Benoit